

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

LONZO PATRICK

Defendant.

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) No. 4:17-CR-519 RLW
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MOTION TO CONTINUE THE TRIAL DATE

Comes now Defendant, Lonzo Patrick, through his attorney, Melissa Goymerac, Assistant Federal Public Defender, and requests this Court continue the trial date in this case. In support thereof, Defendant states the following:

1. This matter is set for trial on December 3, 2018;
2. Counsel requires additional time to consult with experts regarding Mr. Patrick's background, particularly his health history and status in anticipation of a negotiated disposition of this matter that will not require a trial;
3. A continuance in this matter is in the interests of justice as it allows a reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161;
4. The government has no objection to this request;
5. Mr. Patrick has previously executed a Speedy Trial Waiver and has discussed the matter of this continuance thoroughly with counsel;
6. Defendant requests the trial of this matter be continued for 60 days and reset on a date convenient for this Court;

WHEREFORE, defendant requests this Court grant his request to continue the trial of this matter from December 3, 2018 for 60 days, and reset on a date convenient for this Court.

Respectfully submitted,

/s/ Melissa K. Goymerac
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bird, Assistant United States Attorney.

Respectfully submitted,

/s/ Melissa K. Goymerac
MELISSA K. GOYMERAC
Assistant Federal Public Defender